Message

Taylor, Kevin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP From:

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C9483DA991924F4D9BC80D5624B14799-TAYLOR, KEVIN]

Sent: 9/23/2020 5:26:59 PM

To: Phyllis Warrilow [Warrilow.Phyllis@epa.gov]

Subject: FW: FDEP Response to the Florida Gas Transmission Venting Event

Sincerely,

Kevin I. Taylor Environmental Engineer | Air Enforcement Branch (AEB)

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U.S. Environmental Protection Agency | Region 4

61 Forsyth Street, S.W. Atlanta, GA 30303

(404) 562-9134 taylor.kevin@epa.gov

From: Taylor, Kevin

Sent: Tuesday, August 4, 2020 11:44 AM

To: Todd Groendyke <Groendyke.Todd@epa.gov>

Subject: FDEP Response to the Florida Gas Transmission Venting Event

Todd,

I spoke to Hasting Read, Deputy Director of the FDEP Air Division. He stated that he was working on the Florida Gas Transmission (FGT) issue since last week, when Bloomberg contacted him while investigating for the article. He stated that there was some maintenance being performed on the turbine at the compressor station and that venting did occur but that is pretty normal during maintenance operations for units fueled by the pipeline to vent when shutting down. He referenced an EPA document from 5 or 6 years ago that stated that there will be some venting when a pipeline has to be shut down for maintenance. He stated that the Brooker facility is an older compressor facility that is pre-greenhouse gas regulations. There are no methane requirements, such as PSD BACT requirement, for the amount of methane emitted. The permit covers the operation of the turbine and other compressor station equipment but does not have requirements for the pipeline itself. There is also no requirement for the pipeline to notify for a release. 112(r) does not regulate methane and the state watch office (the office that receives notification of releases) piggy backs off of EPCRA so, again, no requirement to notify. Hastings also spoke to FGT to ask why they didn't report and they stated that it was not required. Could have been covered by the Pipeline Hazardous Materials Safety Administration (PHMSA) if it was an accident. However, since they knew that the turbine had some problems and that they planned the maintenance event, this was an intentional shutdown and not required to be reported to PHMSA. Therefore, overall, the event was not reportable, not a violation and kind of falls through the hole of regulatory requirements for all of the agencies involved.

Sincerely, Kevin I. Taylor

Environmental Engineer | Air Enforcement Branch (AEB) **Enforcement And Compliance Assurance Division (ECAD)**

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